

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

KLAUSNER TECHNOLOGIES, INC.,
a New York corporation,

Plaintiff,

vs.

Aastra Technologies LTD, et al.

Defendants.

CASE NO. 6:11-cv-480
LEAD CASE

JURY TRIAL DEMANDED

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO
MOTION TO DISMISS UNDER RULE 12(b)(6) AND, ALTERNATIVELY, MOTION
FOR MORE DEFINITE STATEMENT UNDER RULE 12(e) AND MOTION TO STRIKE
UNDER RULE 12(f)**

Plaintiff IPVX Patent Holdings, Inc. (“IPVX”) files this Unopposed Motion for Extension of Time to file a Response to IXC Inc.’s Motion to Dismiss Under Rule 12(b)(6) and, Alternatively, Motion For More Definite Statement Under Rule 12(e) and Motion to Strike Under Rule 12(f) (Dkt. 30 in 6:11-cv-594 matter) and would respectfully show the Court as follows:

The current deadline for IPVX to file its Response is November 12, 2012. IPVX has requested, and IXC Inc. has agreed to, a one week extension of IPVX’s time to file its Response up to and including November 19, 2012. Good cause exists for this extension as IPVX has counsel located in New York that have been affected by the adverse weather. A proposed Order granting this unopposed motion is attached hereto.

WHEREFORE, PREMISES CONSIDERED, Plaintiff IPVX respectfully moves the Court to extend the deadline as set forth above and award such other and further relief as it may show itself justly entitled.

Dated: November 9, 2012

Respectfully submitted,

By: /s/ Elizabeth L. DeRieux
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ATTORNEYS FOR PLAINTIFF,
IPVX PATENT HOLDINGS, INC.

CERTIFICATE OF CONFERENCE

In compliance with Local Rule CV-7(h), I hereby certify that Elizabeth L. DeRieux, counsel for IPVX conferred with Ronald Losch, counsel for IXC Inc. and this motion is unopposed.

/s/ Elizabeth L. DeRieux
Elizabeth L. DeRieux

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served this 9th day of November, 2012, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3). Any other counsel of record will be served by electronic mail, facsimile transmission and/or first class mail on this same date.

/s/ Elizabeth L. DeRieux
Elizabeth L. DeRieux